

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO. 2:19-cv-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING)	
ALABAMA, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT DYNAMIC SECURITY, INC.’S MOTION FOR
ENLARGEMENT OF TIME TO FILE JURY INSTRUCTIONS,
VOIR DIRE QUESTIONS, AND MOTIONS IN LIMINE**

COMES NOW Defendant Dynamic Security, Inc. (“Dynamic”) and requests this Court grant an extension of time for the parties to file jury instructions, voir dire questions, and motions in limine to a date that is seven (7) days after the Court rules on Dynamic’s Motion to Strike Jury Trial (Doc. 89), stating as follows:

1. On December 27, 2022, Dynamic filed, “Defendant Dynamic Security Inc.’s Motion to Strike Jury Trial” (doc. 89), and on January 19, 2023, Plaintiff filed “Plaintiff’s Response to Defendant Dynamic Security’s Motion to Strike Jury Trial.” (Doc. 91). The Court has not yet ruled on this motion.

2. The pretrial conference in this case is set for Tuesday, February 21, 2023, at 2:00 p.m.

3. Three days after the February 21, 2023, pretrial conference, the parties must submit proposed jury instructions and voir-dire questions. Pursuant to this Court's Order (Doc. 57), "[t]he parties shall file any requested voir dire questions, motions in limine fully briefed, and any proposed jury instructions, together with citations of law thereon, on or before **February 24, 2023** unless said time is shortened by the court on motion of either party. Objections to motions in limine, fully briefed, must be filed on or before **March 3, 2023.**" (Doc. 57, Section 13).

4. Should the Court grant Dynamic's Motion to Strike Jury Trial, the parties will not be required to prepare proposed voir dire questions or jury instructions, and whether or not the case is to be tried before a jury will likely impact which motions in limine the parties prepare and file.

5. In the interest of judicial economy and conserving the parties' resources, Dynamic seeks an extension for these filings from February 24 to a date that is seven (7) days after the Court rules on the Motion to Strike Jury Trial, and an extension for filing objections by the same amount of time.

6. Undersigned counsel sent an email to Plaintiff's counsel and inquired if they consented to Dynamic seeking this extension on these grounds, but undersigned counsel did not receive a response.

7. This brief extension of time will not prejudice any party or the Court.

Respectfully submitted,

/s/Susan W. Bullock

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 21st day of February, 2022, she electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System, which will provide a copy to counsel of record:

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